



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION I**

**5 POST OFFICE SQUARE, SUITE 100, BOSTON, MASSACHUSETTS 02109-3912**

*Certified Mail – Return Receipt Requested*

June 27, 2011

Scott Alfonse, Director  
Environmental Stewardship Department  
City of New Bedford  
133 William Street, Room 304  
New Bedford, Massachusetts 02740

Re: June 17, 2011 TRC Response to USEPA Comments *Stage I Environmental Screening & Stage II Environmental Risk Characterization, Keith Middle School Wetland, New Bedford, MA*, dated Nov 2010.

Dear Mr. Alfonse:

The U.S. Environmental Protection Agency - New England has reviewed the June 17, 2011 TRC Environmental Corporation (TRC) Response to the USEPA April 19, 2011 comments on the *Stage I Environmental Screening & Stage II Environmental Risk Characterization, Keith Middle School Wetland, New Bedford, MA*, dated Nov 2010 (Report).

1. TRC's response to EPA General Comment 4 is unsupported where it writes, "Other receptor groups (herbivorous birds, omnivorous birds/mammals, and insectivorous mammals) are not expected to be adversely affected by the concentrations of total PCBs within the aquatic habitat provided by the KMS wetland."

Since an unacceptable risk exists for muskrat, benthic community, and marsh wren in the Keith Middle School (KMS) wetland, PCBs are also likely to pose the same or greater levels of PCB food chain risk or bioaccumulation potential to other receptors, insectivores, or carnivores represented by these or others higher up in trophic status, whether avian or mammalian.

2. The following TRC response to EPA General Comment 4 should be corrected or supported with data or wetland publication reference, "Additional wetland areas are located downgradient of the KMS wetland and are connected hydrologically to the KMS wetland via an intermittent stream." Based on EPA's observations during a recent site visit, the stream appears to flow perennially (is permanent), NOT intermittently.

The National Hydrography Dataset (NHD) is a USGS product which details surface water bodies and is described on the USGS website as follows:


"The National Hydrography Dataset (NHD) is the surface-water component of *The National Map*. The NHD is a comprehensive set of digital spatial data that represents the surface water of the United States using common features such as lakes, ponds, streams, rivers, canals, streamgages, and dams. Polygons are used to represent area features such as lakes, ponds, and rivers; lines are used to represent linear features such as streams and smaller rivers; and points are used to represent point features such as streamgages and dams. Lines also are used to show the water flow through area features such as the flow of water through a lake. The combination of lines is used to create a network of water and transported material flow to allow users of the data to trace movement in downstream and upstream directions."

Based on the NHD Hi-res, the stream is classified as Perennial.

3. TRC's response to EPA General Comment 4, "Although aquatic macro-invertebrates would be in direct contact with sediment contaminants such as PCBs, the high organic carbon content present within the sediment may result in low bioavailability of PCBs to ecological receptors inhabiting the KMS wetland" should be supported by site data and not simply a broad-based sweeping assumption.

EPA requests that responses to the above be provided as soon as possible. Should you have any questions regarding the above, please feel free to contact me at (617) 918-1527 or Cornell Rosiu at (617) 918-1345.

Sincerely,



Kimberly N. Tisa, PCB Coordinator  
Remediation & Restoration II Branch/RCRA Corrective Action Section  
Office of Site Remediation & Restoration

cc: C. Rosiu, EPA  
D. Sullivan, TRC  
M. Cote, MassDEP  
File